



Matrix Environmental, Inc.

1880 W. Winchester Rd., Suite 111

Libertyville, Illinois 60048

Phone: 847-367-6835

Fax: 847-367-6845

7 December 2007

Ms. Bhooma Sundar, Ph.D.
U.S. Environmental Protection Agency, Region 5
RCRA Enforcement and Compliance Assurance Branch (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Central Wire, Union, Illinois Site Progress Report for November 2007

Dear Ms. Sundar:

Enclosed please find the Monthly Progress Report for the Central Wire facility located in Union, Illinois for the month of November 2007.

If you have any comments or questions regarding the progress of this project, please do not hesitate to call me at (847) 367-6835.

Sincerely,

Carlos J. Serna, P.G.
Matrix Environmental, Inc.

CJS:sk

Attachment

cc: Mr. Gerald W. Ruopp, Central Wire
Mr. Henry Lopes, Central Wire
Mr. Scott Carr, Central Wire
Mr. Steve Hughes, Central Wire
Ms. Joyce Munie, IEPA



UNION PLANT

MONTHLY PROGRESS REPORT
Central Wire Union, Illinois Site
1 November through 30 November 2007

1. **Progress Made This Reporting Period** – This reporting period Central Wire continued the operation and maintenance of the groundwater extraction system. The NPDES Discharge monitoring Report for October is attached to this report.

Matrix used Modflow, a groundwater flow model, to model the movement of groundwater contaminants in the area per U.S.EPA's request. Matrix has calibrated this model against the observed groundwater levels and has run the model for total chlorides. The results were very similar to the Visual Bluebird model whose results were previously transmitted to U.S.EPA.

A copy of the results of this modeling over a sixty year period is included in a disk that will be sent to you under separate cover. Basically the modeling shows that the Central Wire groundwater plume stalls between the Central Wire extraction wells and Illinois Highway Route 176.

The model utilizes four gigabytes of storage space, but can be made available for your review upon request.

2. **Summary of Validated Data and Results** –The September potable well samples were collected and that data has been validated and tabulated. The December semi annual RCRA and the quarterly potable water samples were collected the week ending December 7, 2007.
3. **Upcoming Events/Activities Planned** – The existing remediation systems will continue to operate as planned.

Analytical data from groundwater samples collected in December should be available to report to you in January or February 2008.

Central Wire has finalized the approach to update the RCRA financial assurance instrument and U.S.EPA has agreed to this approach. Central Wire is awaiting written acknowledgement of this concurrence before purchasing the financial instrument that will cover the 2008 projected RCRA financial assurance costs.

4. **Anticipated Problem Areas and Recommended Solutions** – There are no current or anticipated problem areas to be resolved.
5. **Key Personnel Changes** – There have been no key personnel changes this reporting period.
6. **Target and Actual Completion Dates** – This project has not deviated from the project schedule.



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Fax

To: Ms. Bhooma Sundar From: Carlos Serna
Organization: U.S. EPA Pages: 3
Fax Number: 312-353-4342 Date: 10 June 2007
Re: _____ Time: _____

☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Comments:

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10 June 2007

Ms. Bhooma Sundar
U.S. Environmental Protection Agency
Region V
RCRA Enforcement and Compliance Assurance Branch (DE-9J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Central Wire, Union, Illinois Site Progress Report for May 2007

Dear Ms. Sundar:

Enclosed please find the Monthly Progress Report for the Central Wire facility located in Union, Illinois for the month of May 2007. Also, enclosed are the effluent analytical results for this month.

If you have any comments or questions regarding the progress of this project, please do not hesitate to call me at (847) 367-6835.

Sincerely,

Carlos J. Serna, P.G.
Matrix Environmental, Inc.

CJS:sk

Attachment

cc: Gerald W. Ruopp, Central Wire
Henry Lopes, Central Wire
Scott Carr, Central Wire
Steve Hughes, Central Wire
Joyce Munie, IEPA

MONTHLY PROGRESS REPORT
Central Wire Union, Illinois Site
1 May through 31 May 2007

1. **Progress Made This Reporting Period** – This reporting period Central Wire continued the operation and maintenance of the groundwater extraction system. A Groundwater Investigation Report was prepared this reporting period and submitted to the U.S. EPA. The groundwater investigation was performed off-site of the Central Wire facility to determine the extent of the groundwater plume. The groundwater investigation included the use of a Geoprobe sampler to collect multiple groundwater samples at off-site properties in order to effectively track the current extent of the groundwater plume.

The results of the investigation indicated that the contaminants downgradient of the well cluster will follow the predicted flow lines toward the northwest and toward the Central Sod and West Branch Nursery wells. The findings also suggest that the existing extraction wells are capturing the groundwater plume migrating from the Central Wire property. Also the increase in concentrations at the well cluster may have originally existed 500 feet downgradient of the extraction wells, which is the stagnation point of the capture zone. For this reason concentrations at the cluster wells have increased.

The groundwater modeling results presented in the report indicated that groundwater contaminants would degrade prior to migrating the distance downgradient to the potential groundwater receptors. The recommended approach at this time is monitored natural attenuation to monitor the groundwater migration and degradation.

This reporting period groundwater sampling was performed at the on and off site monitoring wells and selected downgradient residential wells.

2. **Summary of Validated Data and Results** –Groundwater data collected this reporting period will be validated or tabulated.
3. **Upcoming Events/Activities Planned** – The existing remediation systems will continue to operate as planned. Also the groundwater results will be analyzed and tabulated.
4. **Anticipated Problem Areas and Recommended Solutions** – There are no current or anticipated problem areas to be resolved.
5. **Key Personnel Changes** – There have been no key personnel changed this reporting period.
6. **Target and Actual Completion Dates** – This project has not deviated from the project schedule.



"Scott Carr"
<scarr@centralwire.com>

10/08/2007 03:36 PM

Please respond to
scarr@centralwire.com

To

Subject: RCRA Financial Assurance

Ms. Peaceman

I have been in discussions with Bhooma Sundar Thursday October 4th regarding Central Wire's need to update our RCRA financial assurance instrument. The EPA attorney assigned to this project is Jacqueline Miller who, as you are likely aware, is on leave. Ms. Sundar indicated that you would be assigned to this project in her absence.

I have attached a copy of the "Irrevocable Standby Letter Of Credit No.S40006/219856" (LC), from the Bank of Nova Scotia. This LC is automatically extended for one year on February 8th unless the USEPA and Central Wire have been notified at least 120 days prior to the expiration date of the LC. This notification will be by certified mail from the Bank of Nova Scotia as stated in the LC.

Attached is the letter addressed to David Novitski from Jacqueline Miller dated March 20th, 2007 addressing our Financial Assurance Issues (FAI) for the Union Plant, if possible, carbon copy me with any corresponds addressing the Union Plant so that I can keep my files up to date. I have attached the FAI response to this email with the RCRA Financial Assurance Adjustments. Central Wire is in the process of updating the value of our RCRA financial assurance instrument. We have received the certified letter address to Henry Lopes dated October 4th which is also addressing the FAI from Bhooma.

Please call me at 815.923.2116x130 after you have read the attachments to this email so we can discuss this proposal.

Thanks you.

Regards,

Scott C. Carr
Environmental Coordinator



UNION LC 2-8-05.pdf letter 3-20-07 FAI.pdf FAI Response(3-20-07) 10-08-07 letter.doc RCRA FA Adjtmnts 10-4-07.xls

MONTHLY PROGRESS REPORT
Central Wire Union, Illinois Site
1 September through 30 September 2007

1. **Progress Made This Reporting Period** – This reporting period Central Wire continued the operation and maintenance of the groundwater extraction system.

Groundwater sampling from the on-site and off-site monitoring wells and selected residential wells were all sampled and submitted to the laboratory in June and laboratory data was received in July 2007. Central Wire will summarize this data and planned to send a report to U.S. EPA and IEPA in August 2007. Central Wire will send this report in October

U.S. EPA has submitted comments on the Central Wire "Groundwater Contamination Plume Evaluation Report" particularly on the modeling portion of that report. Central Wire is currently revising and re-running the models based on those comments. This is a significant amount of work requiring Central Wire to seek out additional well logs of downgradient and side gradient wells. Additional well data was collected by Central Wire and passed on to Matrix Environmental, Inc. (Matrix) to conduct the modeling. Matrix is currently running and fine tuning the groundwater model. Once this is completed, Matrix will model the contaminant plume. This is taking more time than Matrix originally expected. Central Wire projects that the report revisions, based on re-run models will not be available for review until late October and possibly into November 2007. While this is taking some time, you will note from our draft report that Central Wire has defined the downgradient edge of the plume.

2. **Summary of Validated Data and Results** –Groundwater data collected in June has been validated and tabulated. As noted above, Central Wire anticipates sending a summary report with the data in October 2007. In addition, the September potable well samples were collected and that data will be validated and tabulated this month.
3. **Upcoming Events/Activities Planned** – The existing remediation systems will continue to operate as planned. Additionally, as noted above, the June data will be summarized and sent to U.S. EPA and IEPA in October 2007. Lastly, Central Wire is re-running groundwater models to further evaluate plume migration and anticipates having a revised report available in October 2007. Central Wire is working to update and execute a current RCRA financial insurance instrument and has proposed that this be projected forward to purchase and instrument that will cover the 2008 projected costs.
4. **Anticipated Problem Areas and Recommended Solutions** – There are no current or anticipated problem areas to be resolved.
5. **Key Personnel Changes** – There have been no key personnel changes this reporting period.
6. **Target and Actual Completion Dates** – This project has not deviated from the project schedule.



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5 October 2007

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U.S. Environmental Protection Agency
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77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Central Wire, Union, Illinois Site Progress Report for September 2007

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